

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of the Application of

ALLTEL Communications, Inc.

For Designation as an Eligible Telecommunications  
Carrier Pursuant to Section 214(e)(6) of the  
Communications Act of 1934

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Docket No. 96-45  
FCC 97-419

FCC File No. \_\_\_\_\_

APPLICATION OF ALLTEL COMMUNICATIONS, INC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF VIRGINIA

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April 14, 2003

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To: the Chief, Wireline Competition Bureau

**APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF VIRGINIA**

ALLTEL Communications, Inc. on behalf of itself and its wholly-owned and controlled licensee affiliates ("ALLTEL"), and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act"), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier ("ETC") throughout its licensed service area in the State of Virginia. As demonstrated below, ALLTEL meets all the statutory and regulatory prerequisites for ETC designation, and ALLTEL's designation will serve the public interest

**I. ALLTEL's Universal Service Offering**

ALLTEL is the licensee authorized to provide cellular mobile radiotelephone service in Virginia in the following Cellular Market Areas 43, 59, 85, 104, 203, 235, 256, 262, 681, 682, 684, 686, 687, 688, 689 and 691. The Company intends to obtain high cost loop support funding in both rural and non-rural areas to speed the delivery of advanced wireless services to the citizens of Virginia. As an ETC, ALLTEL will also offer a basic universal service package to subscribers who are eligible for Lifeline support. ALLTEL's service offering will be competitive with those of the incumbent local exchange carriers ("LECs").

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ALLTEL currently provides all the services and functionalities supported by the federal universal service program set forth in Section 54.101(a) of the Commission's rules throughout its cellular service area in Virginia. Upon designation as an ETC, ALLTEL will make available to consumers a universal service offering over its cellular network infrastructure, using the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing cellular service customers.

**II. ALLTEL Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC.**

ALLTEL satisfies each of the elements enumerated by the Commission for ETC designation pursuant to Section 214(e)(6) of the Act as set forth in the FCC's *Section 214(e)(6) Public Notice*<sup>1</sup>.

**A. Public Service Commission Has Provided an Affirmative Statement That It Does Not Regulate CMRS Carriers.**

As a CMRS carrier, ALLTEL is entitled to seek designation as an ETC<sup>2</sup>. Section 254(e) of Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support." Pursuant to 47 U.S.C. §214(e)(6) of the Act, the Commission may, upon request, designate as an ETC "a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission."

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it "is not subject to the jurisdiction of a state commission."<sup>3</sup> In its *Twelfth Report and Order*, the Commission stated that where a carrier provides the Commission with an "affirmative statement" from the state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation, the Commission would consider requests filed pursuant to 214(e)(6).<sup>4</sup>

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<sup>1</sup> *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, Public Notice*, 12 FCC Rcd 22947 (1997) ("*Section 214(e)(6) Public Notice*").

<sup>2</sup> *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order*, 12 FCC Rcd 8776,8858-59 (1997) Para. 145 ("*First Report and Order*").

<sup>3</sup> *Section 214(e)(6) Public Notice*, at 22948.

<sup>4</sup> *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscriberhip in Unserved and Underserved Areas, Including Tribal and Insular Areas, Twelfth Report and Order, and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 12208,12264 (2000).

In 1995, the General Assembly of Virginia repealed Chapters 16.1 and 16.2 of Title 56 of the Code of Virginia relating to radio common carriers and cellular mobile radio communications carriers, thus divesting the Virginia State Corporation Commission of jurisdiction over the rates and services of cellular telephone service providers. Further, on October 23, 1995, in Case Number PUC950062, the Virginia State Corporation Commission issued a *Final Order* which states in part that the General Assembly of Virginia clearly established a public policy of deregulating radio common carriers and cellular carriers by repealing various provisions of the law that authorized the Commission to regulate these services. This *Final Order* went on to cancel all certificates of convenience and necessity granted to radio common carriers and cellular carriers and all tariffs filed by those carriers. Finally, on April 9, 2002, in the Application of Virginia Cellular, LLC (Case No. PUC010263) the Virginia State Corporation Commission stated

The Commission finds that Section 214(e)(6) of the Act is applicable to Virginia Cellular's Application as this Commission has not asserted jurisdiction over CMRS carriers and that the Applicant should apply to the FCC for ETC designation.'

The Acts of the General Assembly and the Orders of the Virginia State Corporations Commission constitute an "affirmative statement" from Virginia, as required under Section 214(e)(6), that the FCC is the appropriate authority to consider ALLTEL's application for designation as an ETC in the state.

**B. ALLTEL Offers Each of the Services Supported by the Federal High-Cost Universal Service Program.**

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area. 47 U.S.C. §214(e)(1). The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms!

1. Voice-grade access to the public switched telephone network;
2. Local Usage;

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<sup>5</sup> *Order*, Application of Virginia Cellular LLC for Designation as an Eligible Telecommunications Provider Under 47 U.S.C. Sec. 214(e)(2), Case No. PUC010263 (April 9, 2002) at pages 4-5. See also, Virginia Cellular LLC Petition for Designation as an Eligible Telecommunications Carrier in the State of Virginia, CC Docket No. 96-45, (filed April 26, 2002) and Exhibit A thereto.

<sup>6</sup> See, 47 C.F.R. Sec. 54.101(a).

3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

The *Section 214(e)(6) Public Notice* requires a carrier to certify that it provides each of the supported services, or where appropriate, functionally equivalent services.' As shown below and in the Declaration attached as Exhibit A hereto, ALLTEL currently provides, or will provide upon designation, each of the required services.

1. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth.' ALLTEL meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with LECs, each of ALLTEL's subscribers is able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local Usage. ETC's must include local usage beyond providing simple access to the public switched network as part of a universal service offering. The FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue.' As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, if any, local usage should be required to be provided to customers as part of a universal service offering.' In the *First Report and Order*, the FCC deferred a determination on the amount of

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<sup>7</sup> *Section 214(e)(6) Public Notice*, at 22948<sup>(7)</sup>

<sup>9</sup> *First Report and Order*, at 8810-11.

*See Federal and State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) ("*October 1998 NPRM*").  
*October 1998 NPRM*, at 21277-21281.

local usage that a carrier would be required to provide.” Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. ALLTEL will comply with any and all minimum local usage requirements adopted by the FCC. ALLTEL will meet the local usage requirements by including local usage plans as part of its universal service offering.

3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. §54.101(a)(3). ALLTEL currently uses out-of-band digital signaling and ALLTEL therefore meets this requirement.

4. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.<sup>12</sup> The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.<sup>13</sup> ALLTEL meets the requirement of single-party service in this manner.

5. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E911 includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), but is only required if a public emergency service provider is capable of both receiving and utilizing the data and has made arrangements with carrier for the delivery of the data.<sup>14</sup> ALLTEL currently provides its subscribers with access to emergency services by dialing 911 in accord with this requirement. It either provides, or will provide Phase I (and Phase II) E-911 services in accord with the E-911 deployment schedules agreed to by ALLTEL and the local or other governmental emergency service providers.

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<sup>11</sup> *First Report and Order*, at 8812. *See also, Western Wireless Corporation*, 16 FCC Rcd 48, 52-53 (2000), *aff’d*, FCC 01-311 (October 19, 2001); *Cellco Partnership*, 16 FCC Rcd 39, 42 (2000).

<sup>12</sup> *First Report and Order*, 12 FCC Rcd at 8810.

<sup>13</sup> *Id.*

6. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.<sup>15</sup> ALLTEL meets this requirement by providing each of its subscribers with access to operator services provided by either the Company or other entities (*e.g.* LECs, IXC's, etc.).

7. Access to interexchange service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. "The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms."<sup>16</sup> ALLTEL presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXC's. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code or dial-around number.

8. Access to directory assistance. The ability to place a call to directory assistance is a required service offering." ALLTEL meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212".

9. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. §54.101(a)(9).<sup>18</sup> In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.<sup>19</sup> ALLTEL currently has no Lifeline customers because only carriers designated as an ETC can participate in the provision of Lifeline service. See 47 C.F.R. §§54-400-415. Once designated as an ETC, ALLTEL will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. The Company provides toll-blocking

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<sup>14</sup> See *Id.*, at 8815-17.

<sup>15</sup> *Id.*, at 8817-18.

<sup>16</sup> *Id.*, at 8819.

<sup>17</sup> *Id.*, at 8821.

<sup>18</sup> See *Universal Service Fourth Order on Reconsideration in CC Docket No. 96-45, Report and Order in CC Docket Nos. 96-45, 96-262, 94-1, 91-213, 95-72*, 13 FCC Rcd 5318, 5388 (1997).

<sup>19</sup> *First Report and Order*, at 8821-22.



services. Accordingly, ALLTEL currently has the technology to provide toll blocking and will implement this technology to provide the service at no charge to its Lifeline customers.

**C. ALLTEL Will Offer Supported Services Through its Own Facilities**

The Commission's *Section 214(e)(6) Public Notice* established that a carrier requesting designation must certify that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>20</sup> ALLTEL will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing cellular service customers. See also Exhibit A hereto.

**D. ALLTEL Will Advertise its Universal Service Offering.**

ALLTEL will advertise the availability of the supported services and ~~the~~ corresponding charges in a manner that fully informs the general public within the designated service area of both the available services and the corresponding charges." ALLTEL currently advertises its wireless services through several different media. ALLTEL will use the same media of general distribution used for its cellular service to advertise its universal service offerings throughout the service areas designated by the Commission. ALLTEL will comply with all form and content requirements, if any, promulgated by the FCC in the future and required of all designated ETCs.

**III. ALLTEL Requests Designation Throughout Its Licensed Service Area in Virginia.**

ALLTEL, in its capacity as a provider of cellular services, is not a "rural telephone company" as that term is defined by 47 U.S.C. 153(37). Accordingly, ALLTEL is required to describe the geographic area in which it requests designation.<sup>22</sup> ALLTEL requests ETC designation for its entire licensed service area in Virginia as depicted on the map attached hereto as Exhibit **B**.

Pursuant to Section 54.207 of the Commission's rules, a "service area" is a "geographic area established by a state commission for the purpose of determining universal service obligations and

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<sup>20</sup> *Section 214 (e)(6) Public Notice*, at 22949.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

support mechanisms.” 47 C.F.R. §54.207(a). For non-rural service areas, there are no restrictions on how a state commission defines the “service area” for purposes of designating a competitive ETC. Therefore, the Commission may designate ALLTEL as an ETC in the non-rural wire centers set forth in Exhibit C attached hereto. To the extent ALLTEL serves only a portion of the wire center, ALLTEL requests ETC designation in that portion of the wire center where it provides service.

In an area served by a rural telephone company, the FCC’s rules define “service area” to mean the LEC study area unless a different definition of service area is established for such company.<sup>23</sup> The rural LEC study areas that ALLTEL serves in their entirety are set forth in Exhibit D attached hereto. The Commission may designate ALLTEL as an ETC in those areas upon a finding that such designation would be in the public interest (*see* Section V below).<sup>24</sup>

In situations where ALLTEL is not licensed to serve a rural ILEC study area in its entirety, ALLTEL may be designated as an ETC once the FCC redefines the ILEC’s service area in accordance with FCC rule section 54.207(c)(1). Where ALLTEL serves only a portion of a wire center, it requests that it be designated as an ETC in that portion of the wire center in which it provides service.

The Virginia State Corporation Commission does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC, therefore the FCC has jurisdiction to consider a redefinition of the ILEC service areas in Virginia for ETC purposes, as set forth in Section IV below.

#### **IV. ALLTEL Requests that Affected Rural LEC Service Areas be Redefined.**

Pursuant to 47 C.F.R. §54.207(c)(1), a petition to redefine a rural LEC service area must contain, “an analysis that takes into account the recommendations of any Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company.” ALLTEL requests that the Commission redefine the service areas of Central Telephone Company – Virginia and United Inter-Mountain Telephone to exclude the wire centers listed in Exhibit E attached hereto. ALLTEL serves only a portion of the service area of these two companies. Accordingly, the Commission may prefer to define the wire centers that ALLTEL serves as one service area and the

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<sup>23</sup> *See*, 47 C.F.R. §54.207(b); .

<sup>24</sup> 47 U.S.C. §214(e)(2).

wire centers that ALLTEL does not serve as a separate service area. The wire centers ALLTEL does not serve are set forth in Exhibit E.

The FCC has adopted a plan for disaggregation of rural LEC study areas in its *Fourteenth Report and Order*, noting that such action “achieves a reasonable balance between rural carriers’ needs for flexibility and the Commission’s goal of encouraging competitive entry.”<sup>25</sup> In the instant case, reclassifying rural LEC service areas for ETC purposes is necessary in order to facilitate competitive entry.

In the *Recommended Decision* that laid the foundation for the FCC’s *First Report and Order*, the Federal-State Joint Board enumerated three factors to be considered when redefining a rural service area.<sup>26</sup> First, the Joint Board advised the state commission to consider whether the competitive carrier is attempting to “cream skim” by only proposing to serve the lowest cost exchanges.<sup>27</sup> As a wireless carrier, ALLTEL is restricted to providing service in those areas where it is licensed to provide service by the FCC. ALLTEL is not picking and choosing the lowest cost exchanges, but rather ALLTEL has based its requested ETC area solely on the basis of its licensed service area, which it proposes to serve in its entirety. Second, the Joint Board urged the Commission to consider the rural carrier’s special status under the Telecommunications Act of 1996.<sup>28</sup> In deciding whether to award ETC status to ALLTEL, the Commission will weigh numerous factors and will consider the manner in which the public interest is affected by an award of ETC status pursuant to 47 C.F.R. § 214(e)(2). Congress mandated this public interest analysis in order to protect the special status of rural carriers in the same way it established special considerations for rural carriers with regard to interconnection, unbundling, and resale requirements.<sup>29</sup> Accordingly, if the Commission finds that ALLTEL’s ETC designation is in the public interest, it has duly recognized the special status of the rural carrier for purposes of determining whether

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<sup>25</sup> *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order*, FCC 01-157, Docket 96-45, 23 CR 1338 (May 23, 2001) para. 144 (“*Fourteenth Report and Order*”).

<sup>26</sup> *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87 (1996).

<sup>27</sup> *Recommended Decision*, 12 FCC Rcd 97, at para. 172.

<sup>28</sup> *Id.* para. 173.

<sup>29</sup> *Id.* para. 173.

ALLTEL's service area designation should be adopted for federal universal service funding purposes. No action in this proceeding will affect or prejudice any future action this Commission may take with respect to the LEC's status as a rural telephone company.

Finally, the Federal-State Joint Board recommended that the FCC consider the administrative burden a rural LEC may face by calculating its costs on a basis other than its entire study area." In the instant case, ALLTEL is proposing to redefine rural LEC service areas solely for ETC designation purposes. Redefining service areas for ETC purposes will in no way impact the way the affected rural LECs calculate their costs, but it is solely to determine the LEC area in which ALLTEL is to be designated as an ETC. LECs may disaggregate their study areas to reallocate high cost loop support payments pursuant to the FCC's *Fourteenth Report and Order*." Accordingly, redefining rural LEC service areas as proposed herein will not impose any additional burdens on rural LECs.

**V. Granting This Application Will Serve the Public Interest.**

ALLTEL is seeking designation in areas served by rural LECs. The FCC must therefore consider the public interest factors supporting ALLTEL's application prior to designating it as an ETC pursuant to 47 U.S.C. §214(e)(6). Designating ALLTEL as an ETC in Virginia would further the public interest by bringing the benefits of additional competition and service offerings to an under served marketplace.

The FCC has recognized the advantages wireless carriers can bring to the universal service program. In particular, the FCC has found that "imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at much lower costs than traditional wireline service."<sup>32</sup> One of the principal goals of the Telecommunications Act of 1996 was to "promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the

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<sup>30</sup> *Id.* para 174.

<sup>31</sup> *Fourteenth Report and Order, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers Federal-State Joint Board on Universal Service, Second Report and Order and Further Notice of Proposed Rulemaking*, 25 CR 1 (November 8, 2001).

<sup>32</sup> *First Report and Order*, 12 FCC Rcd. 8776, 8882-8883.

rapid deployment of new telecommunications technologies.”<sup>33</sup> Competition drives down prices and promotes the development of advanced communications as carriers vie for a consumer’s business.

In its decision to designate Western Wireless as an ETC in the State of Wyoming, the FCC observed, “Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”<sup>34</sup> Similarly, in designating the cellular carrier Smith Bagley, Inc. as an ETC in Arizona, the state commission found competitive entry to provide additional consumer choice and a potential solution to “health and safety risks associated with geographic isolation.”<sup>35</sup> More recently, in designating Guam Cellular and Paging, Inc. as an ETC in the territory of Guam, the Commission found that the designation of Guamcell as an ETC in the area served by the rural LEC in Guam would serve the public interest “by promoting competition and the provision of new technologies to consumers in high cost and rural areas in Guam.”<sup>36</sup>

Designating ALLTEL as an ETC will bring to consumers the benefits of competition, including increased choices, higher quality service, and lower rates. In a competitive market, rural consumers will be able to choose the services that best meet their communications needs. With a choice of service providers, the consumer is able to select a provider based on service quality, service availability, and rates.

The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural LECs emphasizes competition and consumer benefit, not protection of the incumbent LEC. In considering the impact that Western Wireless’ ETC designation would have on rural telephone companies, the Commission noted, “[W]e believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its customers.”<sup>37</sup> Further, Congress has mandated that universal service provisions be “competitively neutral” and “necessary to preserve and advance universal service.” See, 47 U.S.C. §253(b). Designating

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<sup>33</sup> Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

<sup>34</sup> *Western Wireless Corporation*, DA 00-2896 (released December 26, 2000) (“*Wyoming Order*”), 16 FCC Rcd. 48, 55; *aff’d*, FCC 01-311 (released October 19, 2001), at para.17.

<sup>35</sup> *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207 (Arizona, December 15, 2001), at p. 12.

<sup>36</sup> *Guam Cellular and Paging, Inc.*, DA 02-174, (released January 25, 2002).

ALLTEL as an ETC would provide those consumers in covered rural areas in Virginia another choice for advanced telecommunications services.

ALLTEL will implement a variety of service offerings and rate plans that will be both competitive with incumbent LEC service offerings and affordable to Virginia's consumers. ALLTEL commits that its local calling area will be at least as large as the incumbent LEC. Indeed, ALLTEL believes that in all cases its local calling area will be substantially larger, thereby affording consumers the opportunity to reduce the intra-LATA toll charge typically associated with the service of rural LECs.

ALLTEL commits to use available federal high cost support for its intended purposes – the construction, maintenance and upgrading of facilities serving the rural areas. ALLTEL can conceive of no business plan for remote rural areas that can support the deployment of a wireless network sufficiently robust to compete on a level playing field with incumbent LECs in the absence of the subsidy high cost support provides. Indeed, without the high cost program it is doubtful that many rural areas would have wireline telephone service even today. Provision of high cost support to ALLTEL will begin to level the playing field with the incumbent LECs and make available, possibly for the first time, a potential competitor for primary telephone service in remote areas of Virginia.

## **VI. High Cost Certification**

Under Sections 54.313 and 54.314 of the Commission's rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation ("USAC") their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. As explained above, the Virginia State Corporations Commission does not exercise jurisdiction over CMRS carriers such as ALLTEL. Therefore, in accordance with Section 54.313(b) and 54.314(b), ALLTEL has submitted its high-cost certification with the FCC and USAC. A copy of this certification is attached hereto as Exhibit F.

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<sup>37</sup> *Id.* at para.22.

ALLTEL respectfully requests that the Commission issue a finding that ALLTEL has met the high-cost certification requirement and that ALLTEL is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.<sup>38</sup>

#### **VII. Anti-Drug Abuse Certification**

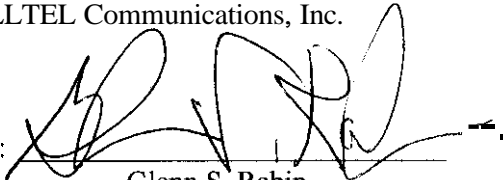
ALLTEL certifies that no party to this petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862. See Exhibit G hereto.

#### **VIII. Conclusion**

ALLTEL respectfully request the Commission to designate it as an ETC on an expedited basis.

Respectfully submitted,

ALLTEL Communications, Inc.

By:   
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Dated: April 14, 2003

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<sup>38</sup> See Cellular South License, Inc. *Petition for Waiver of FCC Rule Section 54.313*, filed January 9, 2002, **Guam** Cellular and Paging, Inc. *Petition for Waiver of FCC Rule Section 54.314*, filed February 6, 2002 para. 11.

**EXHIBIT A**  
**DECLARATION**



## EXHIBIT A

### DECLARATION UNDER PENALTY OF PERJURY

I, Glenn S. Rabin, do hereby declare under penalty of perjury as follows:

1. I am an authorized representative of ALLTEL Communications, Inc. ("ALLTEL," ) with respect to ALLTEL's application for designation as an eligible telecommunications carrier ("ETC") in the State of Virginia. This affidavit is submitted in support that application.

2. ALLTEL is the licensee authorized to provide cellular radiotelephone service in Virginia, and is authorized to provide service in the requested ETC area described in this application.

3. ALLTEL is not subject to state commission jurisdiction in the State of Virginia. ALLTEL is seeking designation as an ETC under Section 214(e)(6) of the Communications Act of 1934, as amended.

4. ALLTEL meets the criteria for ETC designation as detailed below.

5. ALLTEL is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. §214(e)(1). A "common carrier" is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission's Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. §20.9(a)(7).

6. ALLTEL currently offers and is able to provide, within its designated service areas, the services and functionalities identified in 47 C.F.R. §54.101(a). Each of these services and functionalities is discussed more fully below.

a. Voice-made access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45. First Report and Order*, 12 FCC Rcd 8776, 8810-11 (1997) ("*Universal Service Order*"). ALLTEL meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, including BellSouth Telecomm, Inc. ("BellSouth"), all customers of ALLTEL are able to make and receive calls on the public switched telephone network within the specified bandwidth.

b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue. *See Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) ("*October 1998 NPRM*"). As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, *if any*, local usage should be required to be provided to customers as part of a universal service offering, *October 1998 NPRM* at 21277-21281. In the *Universal Service Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide. *Universal Service Order* at 8813. Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. ALLTEL will comply with any and all minimum local usage requirements adopted by the

FCC. ALLTEL will meet the local usage requirements by including local usage as part of its universal service offering.

c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. §54.101(a)(3). ALLTEL currently uses out-of-band digital signaling that is functionally equivalent to DTMF signaling. ALLTEL therefore meets the requirement to provide DTMF signaling or its functional equivalent.

d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Universal Service Order* at 8810. ALLTEL meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E911 includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), but is only required if a public emergency service provider is capable of both receiving and utilizing the data and has made arrangements with carrier for the delivery of the data.<sup>39</sup> ALLTEL currently provides its subscribers with access to emergency services by dialing 911 in accord with this requirement. It either provides, or will provide Phase I (and Phase II) E-911 services in accord with the E-911 deployment schedules agreed to by ALLTEL and the local or other governmental emergency service providers.

f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Universal Service Order*, 8817-18. ALLTEL meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC’s, etc.).

g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required, “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Service Order* at 8819. ALLTEL presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and each of several IXC’s. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code or dial-around number.

h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. ALLTEL meets this requirement by providing all of its customers with access to directory assistance by dialing “411” or “555-1212”.

i. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. §54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of

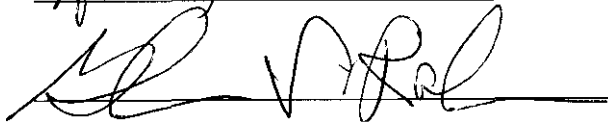
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<sup>39</sup> *See Id.*, at 8815-17.

outgoing toll calls. *Universal Service Order*, at 8821-22. ALLTEL currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. §54.400-415. Once designated as an ETC, ALLTEL will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. Today, the Company provides toll-blocking services. Accordingly, ALLTEL currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.

7. ALLTEL will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing conventional mobile cellular service customers.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 14 2003, 2003.

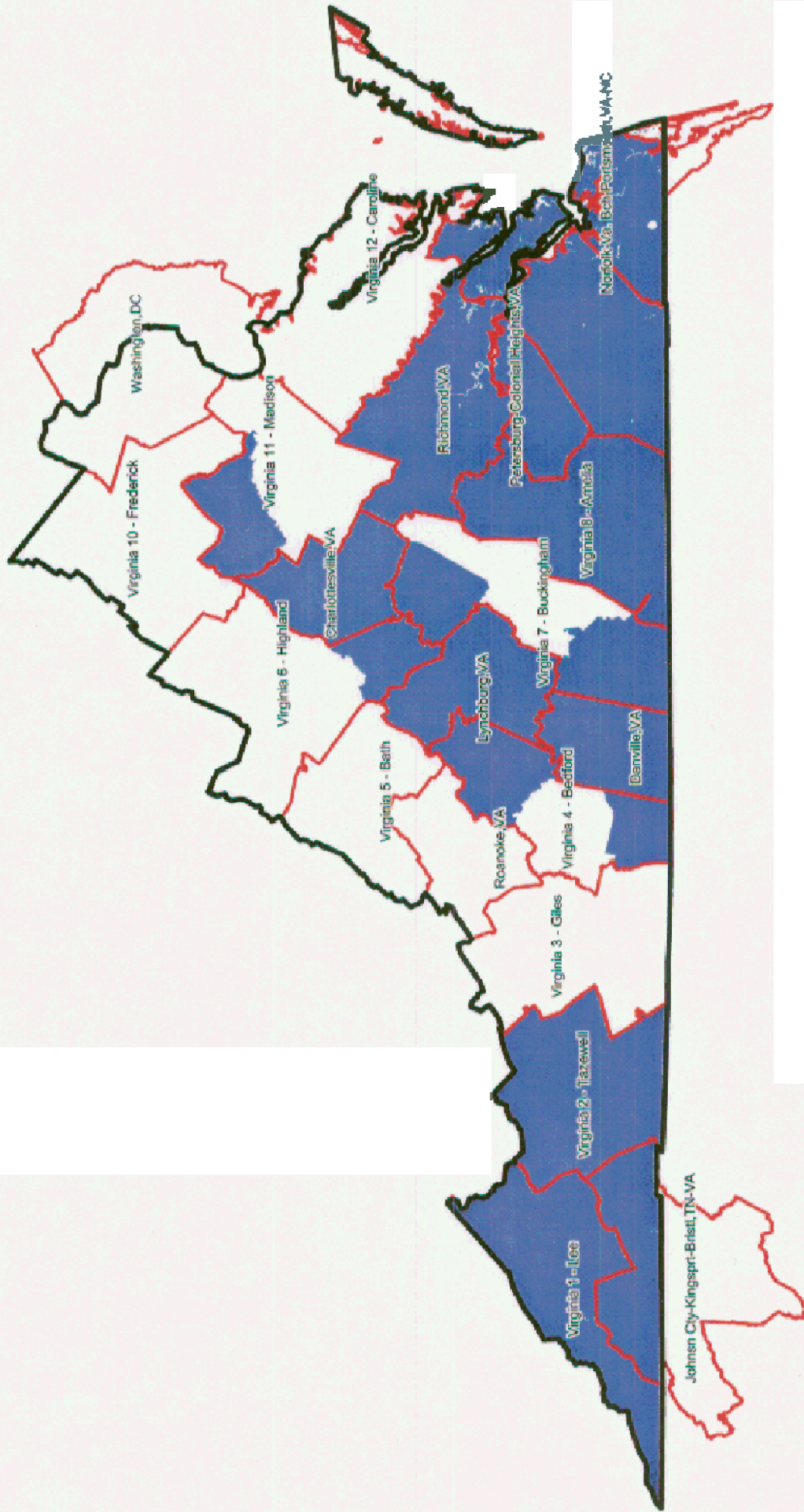
A handwritten signature in black ink, appearing to be "R. V. Ral", written over a horizontal line.

Its Authorized Representative

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**EXHIBIT B**  
**MAP OF SERVICE AREA**

# Virginia



## ALLTEL Wireless Coverage

**EXHIBIT C**  
**NON – RURAL WIRE CENTERS**

## EXHIBIT C

| Non Rural Service Areas Where ALLTEL is Licensed |                      |                |           |
|--|----------------------|----------------|-----------|
| COMPANY  | COUNTY               | WIRE CENTER    | CLLI      |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Brunswick County     | ALBERTA        | ALBRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Amhent County        | AMHERST        | AMHRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Appomanox County     | APPOMATTOX     | APMTVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Mecklenburg County   | BOYDTON        | BMNVAXA   |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Southampton County   | BOYKINS        | BYKNVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Southampton County   | CAPRON         | CPRNVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Isle of Wight County | CARROLLTON     | CRTDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Mecklenburg County   | CHASE CITY     | CSCYVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Chesapeake city      | CHESAPEAKE     | HCKRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Chesapeake city      | CHESAPEAKE     | GRBRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Mecklenburg County   | CLARKSVILLE    | CLVLVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Southampton County   | COURTLAND      | CRLDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Surry County         | DENDRON        | DNDRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Prince George County | DISPUTANTA     | DSPAVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Hanover County       | DOSWELL        | DSWL VAXA |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Greensville County   | EMPORIA        | EMPRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Mecklenburg County   | EPPEFORK       | EPFKVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Franklin city        | FRANKLIN       | FKLNVAXB  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Appomattox County    | GLADSTONE      | GLDSVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Gloucester County    | GLOUCESTER     | GLCSVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Chesapeake city      | GREAT BRIDGE   | GRBRVAXB  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Brunswick County     | GUSBURG        | SBWKVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Hanover County       | HANOVER        | HNVRVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Gloucester County    | HAYES          | HAYSVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Southampton County   | IVOR           | IVORVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Sussex County        | JARRATT        | JRRNAXA   |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Brunswick County     | LAWRENCEVILLE  | LRVLVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Hanover County       | MECHANICSVILLE | OLCHVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Amhent County        | MONROE         | ALWDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Isle of Wight County | SMITHFIELD     | SMFDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Prince George County | SPG GROVE      | CLMTVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Sussex County        | STONY CRK      | STCKVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Suffolk city         | SUFFOLK        | HLLDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Suffolk city         | SUFFOLK        | CHKTVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Surry County         | SURRY          | SRRWAXA   |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Virginia Beach city  | VA BCH         | PRANVAXB  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Virginia Beach city  | VIRGINIA BEACH | PUNGVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Virginia Beach city  | VIRGINIA BEACH | PRANVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Sussex County        | WAKEFIELD      | WKFDVAXA  |
| VERIZON SOUTH INC.-VA (CONTEL)                   | Isle of Wight County | WINDSOR        | WNDSVAXA  |
| VERIZON VIRGINIA INC.                            | Wise County          | APPALACHIA     | APLCVAAP  |
| VERIZON VIRGINIA INC.                            | Nelson County        | ARRINGTON      | PNRWAPR   |
| VERIZON VIRGINIA INC.                            | Hanover County       | ASHLAND        | ASLDVAAS  |
| VERIZON VIRGINIA INC.                            | Bedford County       | BEDFORD        | BDFRVABD  |
| VERIZON VIRGINIA INC.                            | Chesterfield County  | BETHIA         | BTHIVABT  |
| VERIZON VIRGINIA INC.                            | Bedford County       | BIG ISLAND     | BGISVABI  |
| VERIZON VIRGINIA INC.                            | Wise County          | BIG STONE GAP  | BSGPVABG  |
| VERIZON VIRGINIA INC.                            | Russell County       | CASTLEWOOD     | DCVLVADV  |
| VERIZON VIRGINIA INC.                            | Charles City County  | CHARLES CITY   | CHCYVACC  |
| VERIZON VIRGINIA INC.                            | Pittsylvania County  | CHATHAM        | CHHMOVACH |

## EXHIBIT C

| Non Rural Service Areas Where ALLTEL is Licensed |                       |                |          |
|--|-----------------------|----------------|----------|
| COMPANY  | COUNTY                | WIRE CENTER    | CLLI     |
| VERIZON VIRGINIA INC.                            | Portsmouth city       | CHESAPEAKE     | CHSKVACD |
| VERIZON VIRGINIA INC.                            | Chesapeake city       | CHESAPEAKE     | CHSKVAGU |
| VERIZON VIRGINIA INC.                            | Chesapeake city       | CHESAPEAKE     | CHSKVADC |
| VERIZON VIRGINIA INC.                            | Chesterfield County   | CHESTER        | CHESVACR |
| VERIZON VIRGINIA INC.                            | Dinwiddie County      | CHURCHROAD     | WHOKVAWO |
| VERIZON VIRGINIA INC.                            | Dickenson County      | CLINTWOOD      | CLWDVACW |
| VERIZON VIRGINIA INC.                            | Dickenson County      | CLINTWOOD      | CLNCVACL |
| VERIZON VIRGINIA INC.                            | Halifax County        | CLOVER         | CLVRVACL |
| VERIZON VIRGINIA INC.                            | Wise County           | COEBURN        | COBNVACB |
| VERIZON VIRGINIA INC.                            | Colonial Heights city | COLONIAL HTS   | CLHGVACO |
| VERIZON VIRGINIA INC.                            | Campbell County       | CONCORD        | CNCRVACN |
| VERIZON VIRGINIA INC.                            | Madison County        | CRIGLERSVILLE  | CGVLVACL |
| VERIZON VIRGINIA INC.                            | Culpeper County       | CULPEPER       | CLPPVARV |
| VERIZON VIRGINIA INC.                            | Culpeper County       | CULPEPER       | CLPPVACU |
| VERIZON VIRGINIA INC.                            | Culpeper County       | CULPEPER       | CLPPVAGR |
| VERIZON VIRGINIA INC.                            | Russell County        | DANTE          | DANNADA  |
| VERIZON VIRGINIA INC.                            | Pittsylvania County   | DANVILLE       | DAVLVAFP |
| VERIZON VIRGINIA INC.                            | Buchanan County       | DAVENPORT      | DVPNADP  |
| VERIZON VIRGINIA INC.                            | Dinwiddie County      | DINWIDDIE      | DNWDVADW |
| VERIZON VIRGINIA INC.                            | Goochland County      | GOOCHLAND      | FIFEVAFI |
| VERIZON VIRGINIA INC.                            | Goochland County      | GOOCHLAND      | GCLDVAGO |
| VERIZON VIRGINIA INC.                            | Nelson County         | GREENWOOD      | GNWDVAGW |
| VERIZON VIRGINIA INC.                            | Hampton city          | HAMPTON        | HMPNVAWD |
| VERIZON VIRGINIA INC.                            | Hampton city          | HAMPTON        | HMPNVAQN |
| VERIZON VIRGINIA INC.                            | York County           | HAMPTON        | HMPNVADC |
| VERIZON VIRGINIA INC.                            | Hampton city          | HAMPTON        | HMPNVAAB |
| VERIZON VIRGINIA INC.                            | Dickenson County      | HAYSI          | HYSIVAHY |
| VERIZON VIRGINIA INC.                            | Russell County        | HONAKER        | HNKRVAHK |
| VERIZON VIRGINIA INC.                            | Hopewell city         | HOPEWELL       | HPWLVAHW |
| VERIZON VIRGINIA INC.                            | Lee County            | JONESVILLE     | JNVLVAJV |
| VERIZON VIRGINIA INC.                            | Russell County        | LEBANON        | LBNNVALB |
| VERIZON VIRGINIA INC.                            | Russell County        | LEBANON        | SWCKVASC |
| VERIZON VIRGINIA INC.                            | Culpeper County       | LIGNUM         | CLPPVALI |
| VERIZON VIRGINIA INC.                            | Nelson County         | LOVINGSTON     | LVTNVALN |
| VERIZON VIRGINIA INC.                            | Lynchburg city        | LYNCHBURG      | LYBGVACV |
| VERIZON VIRGINIA INC.                            | Campbell County       | LYNCHBURG      | LYBGVAYB |
| VERIZON VIRGINIA INC.                            | Bedford County        | LYNCHBURG      | LYBGVANL |
| VERIZON VIRGINIA INC.                            | Lynchburg city        | LYNCHBURG      | LYBGVATM |
| VERIZON VIRGINIA INC.                            | Bedford County        | LYNCHBURG      | LYBGVAOF |
| VERIZON VIRGINIA INC.                            | Lynchburg city        | LYNCHBURG      | LYBGVACH |
| VERIZON VIRGINIA INC.                            | Amhent County         | LYNCHBURG      | LYBGVAMH |
| VERIZON VIRGINIA INC.                            | Madison County        | MADISON        | MDSNVAMA |
| VERIZON VIRGINIA INC.                            | Goochland County      | MANAKIN        | MNKNVAMN |
| VERIZON VIRGINIA INC.                            | Dinwiddie County      | MCKENNEY       | MCKWAMK  |
| VERIZON VIRGINIA INC.                            | Hanover County        | MECHANICSVILLE | MCHWAMV  |
| VERIZON VIRGINIA INC.                            | Chesterfield County   | MIDLOTHIAN     | MDLNAME  |
| VERIZON VIRGINIA INC.                            | Nelson County         | NELLYSFORD     | NLFRVANF |
| VERIZON VIRGINIA INC.                            | Newport News city     | NEWPORT NEWS   | NWNWVAJF |
| VERIZON VIRGINIA INC.                            | Newport News city     | NEWPORT NEWS   | NWNWVAHU |
| VERIZON VIRGINIA INC.                            | Newport News city     | NEWPORT NEWS   | NWNWVAYK |



EXHIBIT C

| Non Rural Service Areas Where ALLTEL is Licensed |                     |                  |          |
|--|---------------------|------------------|----------|
| COMPANY  | COUNTY              | WIRE CENTER      | CLLI     |
| VERIZON VIRGINIA INC.                            | Newport News city   | NEWPORT NEWS     | NWNVVAHV |
| VERIZON VIRGINIA INC.                            | Newport News city   | NEWPORT NEWS     | NWNVWAND |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVAGS |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVAWC |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVABS |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVASP |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVABL |
| VERIZON VIRGINIA INC.                            | Norfolk city        | NORFOLK          | NRFLVAOD |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | NORFOLK          | NRFLVAOV |
| VERIZON VIRGINIA INC.                            | Norton city         | NORTON           | NRTNVANO |
| VERIZON VIRGINIA INC.                            | Lee County          | PENNINGTONGAP    | PNGPVAPG |
| VERIZON VIRGINIA INC.                            | Wise County         | PENNINGTONGAP    | PONDVAPO |
| VERIZON VIRGINIA INC.                            | Chesterfield County | PETERSBURG       | PTBGVACD |
| VERIZON VIRGINIA INC.                            | Petersburg city     | PETERSBURG       | PTBGVAPB |
| VERIZON VIRGINIA INC.                            | Portsmouth city     | PORTSMOUTH       | PTMOVAHS |
| VERIZON VIRGINIA INC.                            | Portsmouth city     | PORTSMOUTH       | PTMOVAHF |
| VERIZON VIRGINIA INC.                            | Powhatan County     | POWHATAN         | PWHNAPW  |
| VERIZON VIRGINIA INC.                            | New Kent County     | PROVIDENCE FORGE | PRFRVAPF |
| VERIZON VIRGINIA INC.                            | New Kent County     | QUINTON          | QNTNVAQN |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | VARNVAVR |
| VERIZON VIRGINIA INC.                            | Chesterfield County | RICHMOND         | RCMDVACG |
| VERIZON VIRGINIA INC.                            | Chesterfield County | RICHMOND         | RCMDVAIT |
| VERIZON VIRGINIA INC.                            | Chesterfield County | RICHMOND         | RCMDVALS |
| VERIZON VIRGINIA INC.                            | Richmond city       | RICHMOND         | RCMDVAHL |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVAGK |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVAPS |
| VERIZON VIRGINIA INC.                            | Richmond city       | RICHMOND         | RCMDVASR |
| VERIZON VIRGINIA INC.                            | Henriw County       | RICHMOND         | RCMDVAGY |
| VERIZON VIRGINIA INC.                            | Richmond city       | RICHMOND         | RCMDVAGR |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVARA |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVAPE |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVAHS |
| VERIZON VIRGINIA INC.                            | Richmond city       | RICHMOND         | RCMDVASN |
| VERIZON VIRGINIA INC.                            | Henrico County      | RICHMOND         | RCMDVAHR |
| VERIZON VIRGINIA INC.                            | Hanover County      | RICHMOND         | RCMDVATC |
| VERIZON VIRGINIA INC.                            | Pittsylvania County | RINGGOLD         | RNGLVARG |
| VERIZON VIRGINIA INC.                            | Hanover County      | ROCKVILLE        | RKVLVARK |
| VERIZON VIRGINIA INC.                            | Lee County          | ROSE HILL        | RSHLVALE |
| VERIZON VIRGINIA INC.                            | Tazewell County     | ROSEDALE         | LBNNVARD |
| VERIZON VIRGINIA INC.                            | Henriw County       | SANDSTON         | SNTNVASS |
| VERIZON VIRGINIA INC.                            | Lee County          | ST CHARLES       | STCHVASC |
| VERIZON VIRGINIA INC.                            | Russell County      | ST PAUL          | STPLVASP |
| VERIZON VIRGINIA INC.                            | Bedford County      | STONE MOUNTAIN   | SNMTVASM |
| VERIZON VIRGINIA INC.                            | Suffolk city        | SUFFOLK          | DRVRVADR |
| VERIZON VIRGINIA INC.                            | Suffolk city        | SUFFOLK          | SFFLVASK |
| VERIZON VIRGINIA INC.                            | Suffolk city        | SUFFOLK          | WHVLVAWH |
| VERIZON VIRGINIA INC.                            | James City County   | TOANO            | TOANVATO |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH           | VRBHVAIR |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH           | VRBHVAIL |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH           | VRBHVASR |

## EXHIBIT C

| Non Rural Service Areas Where ALLTEL is Licensed |                     |                |          |
|--|---------------------|----------------|----------|
| COMPANY  | COUNTY              | WIRE CENTER    | CLLI     |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH         | VRBHVACC |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH         | VRBHVAPT |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH         | VRBHVARC |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VA BCH         | VRBHVAVB |
| VERIZON VIRGINIA INC.                            | Bedford County      | VINTON         | SWVLVASV |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VIRGINIA BEACH | VRBHVACT |
| VERIZON VIRGINIA INC.                            | Virginia Beach city | VIRGINIA BEACH | VRBHVAGN |
| VERIZON VIRGINIA INC.                            | Sussex County       | WAVERLY        | WVRLVAWV |
| VERIZON VIRGINIA INC.                            | James City County   | WILLIAMSBURG   | WLBGVAWM |
| VERIZON VIRGINIA INC.                            | Nelson County       | WINTERGREEN    | WNTRVAWG |
| VERIZON VIRGINIA INC.                            | Wise County         | WISE           | WISEVAWI |

**EXHIBIT D**  
**RURAL SERVICE AREAS SERVED**

## EXHIBIT D

| Rural Service Areas Where ALLTEL Is Licensed |                      |                 |           |
|--|----------------------|-----------------|-----------|
| Company                                      | County               | Wire Center     | CLLI Code |
| AMELIATELEPHONE CORP.                        | Amelia County        | AMELIA          | AMELVAXA  |
| BUGGS ISLAND TELEPHONE COOPERATIVE           | Mecklenburg County   | BAKERVILLE      | BCWDVAXA  |
| BUGGS ISLAND TELEPHONE COOPERATIVE           | Mecklenburg County   | LACROSSE        | BCRGVAXA  |
| BURKE S GARDEN TELEPHONE CO. INC.            | Tazewell County      | BURKESGARDEN    | BRGRVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Campbell County      | ALTAVISTA       | ALTVVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Buckingham County    | ARVONIA         | ARVNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | AXTON           | AXTNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Pittsylvania County  | BACHESHALL      | BCHLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | BASSETT         | BSSNAXA   |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Hanover County       | BEAVERDAM       | BVRDVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Nonaway County       | BLACKSTONE      | BLCSVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Fluvanna County      | BREMO BLF       | FKUNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Brunswick County     | BRODNAX         | BRDNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Campbell County      | BROOKNEAL       | BRKNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Buckingham County    | BUCKINGHAM      | BCHMVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Nonaway County       | BURKEVILLE      | BRVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Charlottesville city | CHARLOTTESVILLE | CHVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Albemarle County     | CHARLOTTESVILLE | CHVLVAXB  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | COLLINSVILLE    | COVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Nottoway County      | CREWE           | CREWVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Albemarle County     | CROZET          | CRZTVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Buckingham County    | DILLWYN         | DLWYVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | FIELDALE        | FLDLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Campbell County      | GLADYS          | GLDYVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Hanover County       | GUM TREE        | GMTRVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Halifax County       | HALIFAX         | HLFXVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Lunenburg County     | KENBRIDGE       | KNBRVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Mecklenburg County   | LACROSSE        | LACRVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Martinsville city    | MARTINSVILLE    | MTVIVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Hanover County       | MONTPELIER      | MTPLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Fluvanna County      | PALMYRA         | PLMYVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | RIDGEWAY        | SPNCVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Henry County         | RIDGEWAY        | RDWYVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Campbell County      | RUSTBURG        | RSBGVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Halifax County       | S BOSTON        | SBTNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Mecklenburg County   | S HL            | STHLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Albemarle County     | SCHUYLER        | SCHLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Fluvanna County      | SCOTTSVILLE     | SCVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Greene County        | STANARDSVILLE   | SDVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Halifax County       | TURBEVILLE      | TBVLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Lunenburg County     | VICTORIA        | VCTAVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Halifax County       | VIRGILINA       | VRGLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Halifax County       | VOLENS          | VLNSVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA             | Pittsylvania County  | WHITMELL        | WHTMVAXA  |
| PEOPLES MUTUAL TELEPHONE CO.                 | Pittsylvania County  | GRETNA          | GRENAXA   |
| PEOPLES MUTUAL TELEPHONE CO.                 | Pittsylvania County  | HURT            | HURNAXA   |
| PEOPLES MUTUAL TELEPHONE CO.                 | Pittsylvania County  | RENAN           | RENNVAXA  |
| PEOPLES MUTUAL TELEPHONE CO.                 | Pittsylvania County  | SANDY LEVEL     | SNLVVAXA  |
| SCOTT COUNTY TELEPHONE COOPERATIVE           | Scott County         | CLINCHPORT      | CLPNAXA   |
| SCOTT COUNTY TELEPHONE COOPERATIVE           | Scott County         | DUFFIELD        | DDFDVAXA  |

# EXHIBIT D

| Rural Service Areas Where ALLTEL Is Licensed |                   |                 |           |
|--|-------------------|-----------------|-----------|
| Company                                      | County            | Wire Center     | CLLI Code |
| SCOTT COUNTY TELEPHONE COOPERATI             | Scott County      | DUNGANNON       | DNGNVAXA  |
| SCOTT COUNTY TELEPHONE COOPERATI             | Scott County      | FORT BLACKMORE  | FTBCVAXA  |
| SCOTT COUNTY TELEPHONE COOPERATI             | Scott County      | NICKELSVILLE    | NCVLVAXA  |
| SCOTT COUNTY TELEPHONE COOPERATI             | Scott county      | WILLIAMS MILL   | WLMLVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Washington County | ABINGDON        | ABNGVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Wythe County      | AUSTINVILLE     | ANLVAXA   |
| UNITED INTER-MOUNTAINTELEPHONE               | Bland County      | BLAND           | BLNDVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Bristol city      | BRISTOL         | BRSTVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Bland County      | CERES           | CERSVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Smyth County      | CHILHOWIE       | CHLHVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Grayson County    | COMERS ROCK     | CMRKVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Wythe County      | CRIPPLE CRK     | CRCKVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Washington County | DAMASCUS        | DMSCVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Washington County | DAMASCUS        | KNRKVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Grayson County    | FRIES           | FRISVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Scott County      | GATE CITY       | GTCWAXA   |
| UNITED INTER-MOUNTAINTELEPHONE               | Washington County | GLADE SPRING    | GDSPVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Grayson County    | INDEPENDENCE    | INDPVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Smyth County      | MARION          | MARNVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Wythe County      | MAX MEADOWS     | MXMDVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Washington County | MEADOWVIEW      | MDVWVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Grayson County    | MOUTH OF WILSON | MTWLVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Smyth County      | RICH VALLEY     | RCWVAXA   |
| UNITED INTER-MOUNTAINTELEPHONE               | Wythe County      | RURAL RETREAT   | RRRTVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Smyth County      | SALTVILLE       | SLVLVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Smyth County      | SUGAR GROVE     | SGGWAXA   |
| UNITED INTER-MOUNTAINTELEPHONE               | Wythe County      | WYTHEVILLE      | WYVLVAXA  |
| UNITED INTER-MOUNTAINTELEPHONE               | Carroll County    | GALAX - Partial | GALXVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | BIG ROCK        | MAXIVAXA  |
| VERIZON SOUTH INC.-VA                        | Tazewell County   | BLUEFIELD       | BLFDVAXA  |
| VERIZON SOUTH INC.-VA                        | Tazewell County   | BLUEFIELD       | PCHNVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | GRUNDY          | GRNDVAXB  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | GRUNDY          | BGRKVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | HURLEY          | HRLWAXA   |
| VERIZON SOUTH INC.-VA                        | Bland County      | NARROWS         | RCGPVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | OAKWOOD         | OKWDVAXA  |
| VERIZON SOUTH INC.-VA                        | Tazewell County   | RICHLANDS       | RCLDVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | RICHLANDS       | JWRGVAXA  |
| VERIZON SOUTH INC.-VA                        | Tazewell County   | TAZEWELL        | TZWLVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | VANSANT         | BGPRVAXA  |
| VERIZON SOUTH INC.-VA                        | Buchanan County   | WHITEWOOD       | DWGHVAXA  |

**EXHIBIT E**  
**RURAL WIRE CENTERS NOT SERVED**

**EXHIBIT E**

| <b>Rural Wire Centers Where ALLTEL is NOT Licensed</b> |                      |                    |                  |
|--|----------------------|--------------------|------------------|
| <b>Company</b>   | <b>County</b>        | <b>Wire Center</b> | <b>CLLI Code</b> |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Patrick County       | ARARAT             | ARRTVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Franklin County      | BOONES MILL        | BNMLVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Buena vista city     | BUENAVISTA         | BNVSVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Prince Edward County | FARMVILLE          | FRVLVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Franklin County      | FERRUM             | FRRMVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Warren County        | FRONT ROYAL        | FRRYVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Rockbridge County    | GLASGOW            | GLSGVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Rockbridge County    | GLASGOW            | NTBRVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Prince Edward County | HAMPDEN-SYDNEY     | HMSYVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Rockbridge County    | LEXINGTON          | LXTNVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Page County          | LURAY              | LURYVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Patrick County       | MDWS OF DAN        | MDDNVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Prince Edward County | PROSPECT           | PRSPVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Rockbridge County    | RAPHINE            | BRBGVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Franklin County      | ROCKY MT           | RCMNAXA          |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Page County          | SHENANDOAH         | SHNDVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Page County          | STANLEY            | STNLVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Patrick County       | STUART             | STRNAXA          |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Franklin County      | UNION HALL         | UNHLVAXA         |
| CENTRAL TELEPHONE CO. - VIRGINIA                       | Rappahannock County  | WASHINGTON         | WASHVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Franklin County      | WIRTZ              | BTCHVAXA         |
| CENTRAL TELEPHONE CO. -VIRGINIA                        | Pabick County        | WOOLWINE           | WLWNVAXA         |
| UNITED INTER-MOUNTAIN TELEPHONE                        | Carroll County       | CANA               | CANAVAXA         |
| UNITED INTER-MOUNTAIN TELEPHONE                        | Carroll County       | GALAX              | GALXVAXA         |
| UNITED INTER-MOUNTAIN TELEPHONE                        | Carroll County       | HILLSVILLE         | HLVLVAXA         |
| UNITED INTER-MOUNTAIN TELEPHONE                        | Carroll County       | LAUREL FORK        | LRFKVAXA         |
| UNITED INTER-MOUNTAIN TELEPHONE                        | Carroll County       | SYLVATUS           | SYLVAXA          |

## EXHIBIT E

| Rural Wire Centers Where ALLTEL is NOT Licensed |                      |                |           |
|---|----------------------|----------------|-----------|
| Company   | County               | Wire Center    | CLLI Code |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Patrick County       | ARARAT         | ARRTVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Franklin County      | BOONES MILL    | BNMLVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Buena vista city     | BUENAVISTA     | BNVSVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Prince Edward County | FARMVILLE      | FRVLVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Franklin County      | FERRUM         | FRRMVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Warren County        | FRONT ROYAL    | FRRWAXA   |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Rockbridge County    | GLASGOW        | GLSGVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Rockbridge County    | GLASGOW        | NTBRVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Prince Edward County | HAMPDEN-SYDNEY | HMSWAXA   |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Rockbridge County    | LEXINGTON      | LXTNVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Page County          | LURAY          | LURYVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Patrick County       | MDWS OF DAN    | MDDNVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Prince Edward County | PROSPECT       | PRSPVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Rockbridge County    | RAPHINE        | BRBGVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Franklin County      | ROCKY MT       | RCMTVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Page County          | SHENANDOAH     | SHNDVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Page County          | STANLEY        | STNLVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Patrick County       | STUART         | STRTVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Franklin County      | UNION HALL     | UNHLVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Rappahannock County  | WASHINGTON     | WASHVAXA  |
| CENTRAL TELEPHONE CO. - VIRGINIA                | Franklin County      | WIRTZ          | BTCHVAXA  |
| CENTRAL TELEPHONE CO. -VIRGINIA                 | Patrick County       | WOOLWINE       | WLWNVAXA  |
| UNITED INTER-MOUNTAIN TELEPHONE                 | Carroll County       | CANA           | CANAVAXA  |
| UNITED INTER-MOUNTAIN TELEPHONE                 | Carroll County       | GALAX          | GALXVAXA  |
| UNITED INTER-MOUNTAIN TELEPHONE                 | Carroll County       | HILLSVILLE     | HLVLVAXA  |
| UNITED INTER-MOUNTAIN TELEPHONE                 | Carroll County       | LAUREL FORK    | LRFKVAXA  |
| UNITED INTER-MOUNTAIN TELEPHONE                 | Carroll County       | SYLVATUS       | SYLVAXA   |



**EXHIBIT F**  
**HIGH COST CERTIFICATION**

**EXHIBIT F**

April 14, 2003

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-B204  
Washington, DC 20554

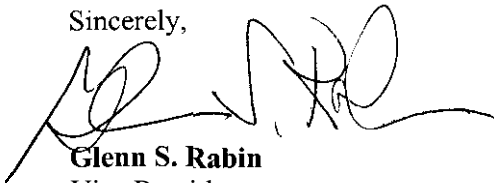
Ms. Irene Flannery  
2120 L Street, N.W.  
Suite 600  
Washington, DC 20037

RE: **ALLTEL** Communications, Inc.  
High Cost Certification  
Docket **No. 96-45**

Dear Ms. Dortch and Ms. Flannery:

On behalf of ALLTEL Communications, Inc., an in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Virginia, we hereby forward the attached certification for high-cost support under the Universal Service program pursuant to Sections 54.313 and 54.314 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn S. Rabin", written over a horizontal line.

**Glenn S. Rabin**  
Vice President  
Federal Communications Counsel

Enclosure

April 14, 2003

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-B204  
Washington, DC 20554

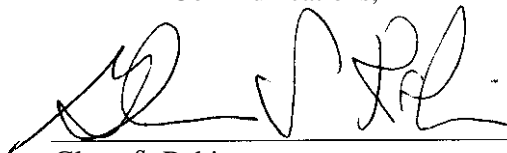
Ms. Irene Flannery  
2120 L Street, N.W.  
Suite 600  
Washington, DC 20037

**RE: ALLTEL communications, Inc., Certification or High Cost Loop Support**

Dear Ms. Dortch and Ms. Flannery:

This certification is submitted on behalf of ALLTEL Communications, Inc. ("ALLTEL") in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Virginia and in accordance with Sections 54.313 and 54.314 of the Commission's rules. On behalf of ALLTEL, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

ALLTEL Communications, Inc



Glenn S. Rabin  
Vice President  
Federal Communications Counsel  
Authorized Representative

Date: April 14, 2003

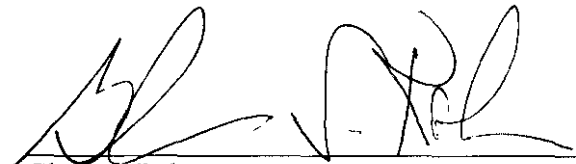
**EXHIBIT G**  
**ANTI-DRUG CERTIFICATION**

## **EXHIBIT G**

### **DECLARATION UNDER PENALTY OF PERJURY**

I, Glenn S. Rabin do hereby declare under penalty of perjury as follows:

1. I am the Vice President, Federal Communications Counsel for ALLTEL Communications, Inc. ("ALLTEL")
2. To the best of my knowledge, neither ALLTEL nor any of its officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission's rules are subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 U.S.C. § 862.
3. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 14, 2003.

A handwritten signature in black ink, appearing to read 'Glenn S. Rabin', written over a horizontal line.

Glenn S. Rabin  
Vice President, Federal Communications Counsel  
ALLTEL Communications, Inc.

**Certificate of Service**

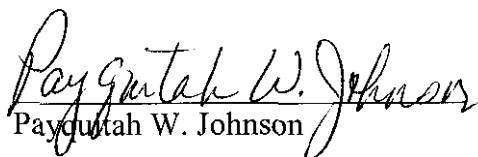
I, Payquith W. Johnson, a secretary with ALLTEL Corporation, do hereby certify that I have on this 14<sup>th</sup> day of April, 2003 had a copy of the foregoing APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER sent via United State Postal Service to the following:

Ms. Marlene Dortch, Secretary\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20004

Qualex International\*  
Portals II  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Ms. Sheryl Todd\*  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Virginia State Corporation Commission  
Attn: Clerk's Office  
1300E. Main Street  
P. O. Box 1197  
Richmond, Virginia 23218

  
Payquith W. Johnson

\* Via Hand Delivery